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Attorneys for Reorganized Debtor

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In Re

ALEXANDER L. LOUKAIDES,

Reorganized Debtor.

Case No.: 8:21-bk-11100-SC

Chapter 11

**POST CONFIRMATION STATUS
REPORT FOR THE REORGANIZED
DEBTOR**

**Post-Confirmation Subchapter V Status
Conference**

Date: July 3, 2024

Time: 11:00 am

Place: Courtroom 5C Virtual

411 W. Fourth Street

Santa Ana, CA 92701

Alexander L. Loukaides, the Reorganized Debtor ("Debtor"), hereby submits this POST
CONFIRMATION STATUS REPORT FOR THE REORGANIZED DEBTOR (the "Report")
for the continued status conference scheduled for July 3, 2024, at 11:00 am.

I. General Overview

On December 16, 2021, the Court entered the Order Confirming Debtor's Chapter 11
Plan of Reorganization for Small Business Filed on July 29, 2021 (ECF No. 126, "Confirmation
Order"). Debtor's Plan took effect on January 1, 2022. *See* ECF No. 131. Debtor completed the
Plan by making the final payment under the modified Plan to the Subchapter V Trustee on or
about January 26, 2024, with a payment of \$49,000. The modified Plan additionally provided

that the Subchapter V Trustee was authorized to disburse to creditors an additional \$5,000 that was returned by Arnold H. Wuhrman as an unused retainer, leaving a total of \$54,000 for final disbursements.

II. Motion by Graduation Solutions LLC

Debtor's Motion for a Non-Material Modification was granted on January 19, 2024, as ECF No. 202. After the order entered on January 19, 2024, became a final order, creditor Graduation Solutions filed curious pleadings that the court considered as a motion for reconsideration. A summary of the pleadings filed by Graduation Solutions is provided below.

ECF No.	Document Title	Document Type	Date Filed
208	Creditor Graduation Solutions LLC's Objection to Discharge and Final Decree Pending an Accounting of Plan Payments and Compliance with Debtor's Chapter 11 Plan and Orders Confirming Same	Unnoticed Objection	March 5, 2024
210	Notice Of Hearing on Motion for Reconsideration and Modification of Fees Awarded To Trustee And Counsel	Notice Without a Motion	April 4, 2024
210-1	Declaration In Support of Motion for Reconsideration and Modification of Fees Granted to Trustee	Declaration Without a Motion	April 4, 2024
210-2	Exhibit A	Exhibit to Declaration Without a Motion	April 4, 2024
210-3	Certificate of Service	Certificate of Service	April 4, 2024

Debtor and the Subchapter V Trustee filed responsive documents on April 17, 2024, to Graduation Solution's March 5, 2024, and April 4, 2024, pleadings. Graduation Solutions, LLC filed its reply on April 29, 2024. The Court held a hearing on May 1, 2024, whereby it adopted its tentative ruling, denying what it considered as a motion for reconsideration, by Graduation Solutions, LLC.

III. Supporting Content

A supporting declaration for this Report is in possession of Debtor and has been approved for filing with the Court but has not yet been signed. The executed supporting declaration will be filed separately as a supplement to the Report.

IV. Communication with the Office of the United States Trustee and the Subchapter V Trustee

Counsel for Debtor communicated with both the Subchapter V Trustee and the Office of the United States Trustee in preparing this Report. The bankruptcy case is ready to close with a final decree after the Subchapter V Trustee disburses to creditors, allows time for checks to clear, files a final fee motion, and performs a final accounting. Debtor understands that a final decree will be ripe in approximately forty days absent objection to a final fee motion.

V. Conclusion

Debtor made all required payments under the Plan and has no further action in this case aside from ongoing reporting requirements until the case closes with a final decree. Debtor requests that the Court continue the status conference for six months at which time the continued status conference should go off calendar as moot because the case will close with a with a final decree.

Dated: June 19, 2024

Respectfully Submitted,

FINANCIAL RELIEF LAW CENTER, APC

/s/ Andy C. Warshaw

Andy C. Warshaw, Esq.

Attorneys for Reorganized Debtor

In re:
Alexander L Loukaides

Debtor(s).

CHAPTER: 11

CASE NUMBER: **8:21-bk-11100-SC**

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**1200 Main St., Suite C
Irvine, CA 92614**

A true and correct copy of the foregoing document entitled: **1) POST CONFIRMATION STATUS REPORT FOR THE REORGANIZED DEBTOR** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **06/19/2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Shraddha Bharatia notices@becket-lee.com
Robert Paul Goe (TR) bktrustee@goeforlaw.com,
kwareh@goeforlaw.com;bkadmin@goeforlaw.com;C187@ecfbis.com;kmurphy@goeforlaw.com;rgoe@goeforlaw.com
Jessica Kastner jkastner@dorflaw.com
Kristin T Mihelic kristin.t.mihelic@usdoj.gov
Richard L. Sturdevant rich@bwlawcenter.com
Scott Talkov scott@talkovlaw.com, talkovlaw@ecf.courtdrive.com
United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
Andy C Warshaw awarshaw@bwlawcenter.com, warshaw.andyb110606@notify.bestcase.com
Dennis C. Winters winterslawfirm@cs.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On -, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on -, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

-None

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

June 19, 2024

Andy C. Warshaw

Date

Printed Name

/s/ Andy C. Warshaw

Signature